

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JOHN BOSHEARS, individually and on  
behalf of all others similarly situated,

Plaintiff,

V.

**PEOPLECONNECT, INC., a Delaware  
Corporation,**

Defendant.

Case No. 2:21-cv-01222-MJP

**JOINT MOTION AND ~~PROPOSED~~ ORDER  
TO EXTEND DEADLINES**

**NOTE ON MOTION CALENDAR:  
January 11, 2024**

Pursuant to Fed. R. Civ. P. 26, Plaintiff Boshears and Defendant PeopleConnect, Inc., by and through their undersigned attorneys, respectfully request the Court to extend the deadline for the Parties to complete arbitration-related discovery to February 23, 2024; extend the deadline for Defendant to answer or otherwise plead to April 8, 2024; extend the deadline for Plaintiff to file any response brief to May 13, 2024; and extend the deadline for Defendant to file any reply brief to May 28, 2024.

1. On September 5, 2023, the Court ordered the Parties to complete arbitration-related discovery by December 4, 2023. (Dkt. 63).

**JOINT MOTION AND PROPOSED ORDER TO EXTEND  
DEADLINES - 1**  
**No. 2:21-cv-01222-MJP**

GORDON      600 University Street  
TILDEN      Suite 2915  
THOMAS      Seattle, WA 98101  
CORDELL      206 467 6477

1       2. On October 20, 2023, Defendant served third-party subpoenas on Plaintiff's  
 2 counsel, Mr. Samuel Strauss and Mr. Benjamin Osborn. The Parties agreed that they should wait  
 3 to negotiate the agreed-upon scope of any third-party subpoenas and to schedule any third-party  
 4 depositions until after Plaintiff has been deposed. Defendant also intends to depose Plaintiff's  
 5 counsel in a related matter, *Izzo et al. v. PeopleConnect, Inc.*, No. 2:22-cv-00016-MJP (W.D.  
 6 Wash.)  
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9       3. On November 7, 2023, the Court issued an Order extending the deadlines in its  
 10 September 5, 2023 Scheduling Order by 60 days so that the Parties would have adequate time to  
 11 negotiate the scope of the third-party subpoenas and take the third-party depositions after Plaintiff  
 12 has been deposed. (Dkt. 68). The Court extended the deadline for the Parties to complete  
 13 arbitration-related discovery to February 2, 2024. *Id.*  
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16       4. Since then, the Parties have met and conferred to schedule depositions of the  
 17 Plaintiffs in this matter and in *Izzo*. The deposition of Plaintiff occurred on January 10, 2024. The  
 18 depositions of the Plaintiffs in *Izzo* will take place on February 6, 2024, which is four days after  
 19 the discovery deadline in this matter.  
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22       5. In the interests of efficiency, the Parties would like to depose both Mr. Strauss and  
 23 Mr. Osborn once, after the depositions of all Plaintiffs in this matter and in *Izzo*.  
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26       6. Fed. R. Civ. P. 26 provides the Court with the discretion to set the schedule for  
 27 discovery.  
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30       7. The Parties thus jointly request that this Court extend the deadlines in its  
 31 November 7, 2023 Scheduling Order by 21 days so that the Parties may efficiently administer the  
 32 third-party depositions of Plaintiff's counsel after the Plaintiffs in this matter and in *Izzo* have been  
 33 deposed.  
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JOINT MOTION AND ~~PROPOSED~~ ORDER TO EXTEND  
 DEADLINES - 2  
 No. 2:21-cv-01222-MJP

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|---------------------------------------|--|
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**WHEREFORE**, Plaintiff and Defendant respectfully request the Court to extend the deadline for the Parties to complete arbitration-related discovery to February 23, 2024; extend the deadline for Defendant to answer or otherwise plead to April 8, 2024; extend the deadline for Plaintiff to file any response brief to May 13, 2024; and extend the deadline for Defendant to file any reply brief to May 28, 2024.

DATED this 11th day of January, 2024.

## PEOPLECONNECT, INC.

JOHN BOSHEARS

/s/ Michael Rosenberger  
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Mark Wilner, WSBA #31550  
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**JOINT MOTION AND PROPOSED ORDER TO EXTEND  
DEADLINES - 3**  
**No. 2:21-cv-01222-MJP**

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4 *Attorneys for Defendant PeopleConnect, Inc.*

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11 IT IS SO ORDERED.  
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14 DATED: January 11, 2024  
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23 Marsha J. Pechman  
24 United States Senior District Judge  
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